

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

DARRYLE POLLARD,

Plaintiff,

-vs-

CASE NO. 1:18-cv-404
HON. GORDON J. QUIST

**CITY OF MUSKEGON HEIGHTS,
BRANDON M. DEKUIPER,
MICHAEL T. EDENS, and
MICHAEL M. RATLIFF,
in their individual and official capacities,**

Defendants.

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| CHRISTOPHER TRAINOR & ASSOCIATES CHRISTOPHER J. TRAINOR (P42449) SHAWN C. CABOT (P64021) Attorneys for Plaintiff 9750 Highland Road White Lake, MI 48386 (248) 886-8650 (248) 698-3321-fax shawn.cabot@cjtrainor.com | PLUNKETT COONEY MICHAEL S. BOGREN (P34835) Attorney for Defendants 950 Trade Centre Way, Ste. 310 Kalamazoo, MI 49002 269-226-8822 269-382-2506-fax mbogren@plunkettcooney.com |
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**PLAINTIFF'S RESPONSE TO DEFENDANTS CITY OF MUSKEGON HEIGHTS,
BRANDON M. DEKUIPER, MICHAEL T. EDENS, AND MICHAEL M. RATLIFF'S
AFFIRMATIVE DEFENSES AND PROOF OF SERVICE**

NOW COMES Plaintiff, **DARRYLE POLLARD**, by and through his attorneys, TRAINOR & ASSOCIATES, and hereby denies each and every one of Defendant's Affirmative Defenses either previously or hereinafter filed, and specifically leaves each Defendant to their proofs of every affirmative defense.

Respectfully Submitted,
CHRISTOPHER TRAINOR & ASSOCIATES

s/Shawn C. Cabot
CHRISTOPHER J. TRAINOR (P42449)
SHAWN C. CABOT (P64021)
Attorneys for Plaintiff
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Dated: May 11, 2018
SCC/sls

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following: ***all attorneys of record***, and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: ***None***.

s/ Shawn C. Cabot (P64021)
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